



**FACT SHEET**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, DRAFT RCRA  
HAZARDOUS WASTE MANAGEMENT PERMIT**

PERMITTEE: **SHELL CHEMICAL YABUCOA INC.**  
**(Formerly Puerto Rico Sun Oil Company LLC)**  
**P. O. Box 186**  
**Yabucoa, Puerto Rico 00767-0186**

FACILITY LOCATION: **Adjacent to the Caribbean Sea and Santiago and Lajas Creeks**  
  
**Road 901, Kilometer 2.7**  
**Camino Nuevo Ward**  
**Yabucoa, Puerto Rico**

FACILITY I.D. NUMBER: **PRD 090 074 071**

**I. INTRODUCTION:**

This Fact Sheet concerns a draft RCRA hazardous waste management permit (the "Draft Permit"), which EPA has issued to SHELL CHEMICAL YABUCOA INC. ("SCYT" or the "Permittee") regarding SCYT's facility, located Yabucoa, Puerto Rico ("SCYT's Yabucoa facility" or the "Facility"). The Facility was formerly owned by Puerto Rico Sun Oil Company LLC ("PRSOC"). As required by RCRA, the Draft Permit sets forth requirements that are proposed to be applicable to the Facility throughout the proposed ten (10) year permit term.

The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA"), 42 U.S.C. §6901 et seq. (referred to collectively as "RCRA" or the "Act"), at Section 3005, 42 U.S.C. §6925, empowers the United States Environmental Protection Agency ("EPA") to establish a permit program for hazardous waste treatment, storage, and disposal facilities ("TSDs"). SCYT's Yabucoa facility is a TSD.

The issuance of this permit is authorized under Title 40 of the Code of Federal Regulations ("40 C.F.R."), Parts 264 and 270. Pursuant to delegated authority, the Director or Deputy Director of the Division of Environmental Planning and Protection (the "Director"), EPA, Region 2, is authorized and responsible for the issuance of the Permit for SCYT's Yabucoa facility. This Fact Sheet contains basic information concerning the Draft Permit.

The purpose of issuing a Draft Permit is to afford the EPA, interested citizens, the proposed permittee, and other governmental agencies and officials the opportunity to evaluate the proposed permit's conditions and requirements and to comment on them. This evaluation process will include a 45 day public comment period, as well as a public hearing, details of which are contained in this Fact Sheet. Information on the public evaluation process is also being provided by newspaper public notice and local radio.

The Draft Permit, if finalized, will authorize the operation and expansion of one hazardous waste

storage area at the Facility, which is owned and operated by the Permittee. Specifically, the Permit allows for the storage of hazardous waste in the on-site regulated hazardous waste storage area (the "HWSA") prior to shipment of the waste off site for treatment and/or disposal. The Permit requires corrective action for all releases of hazardous waste and/or hazardous constituents from any Solid Waste Management Unit (SWMU) at the Facility. Specifically, the Permit requires SCYI to perform investigation and corrective action activities for fifteen (15) Solid Waste Management Units (SWMUs) at the Facility. The Draft Permit also includes a determination that "no further action" is required at other SWMUs. Furthermore, the Draft Permit also contains provisions that will require corrective action investigation for any i) future or newly discovered releases of hazardous wastes at existing SWMUs or Areas of Concerns (AOCs) at the Facility; and ii) newly identified SWMUs or AOCs.

The next section of this Fact Sheet provides information on the Public Notice and the Public Review and Comment period for the Draft Permit, including the deadline for submitting comments. Later sections provide information describing the Facility, the RCRA permitting history of the Facility, the Hazardous Waste Management Unit ("HWMU") to be permitted, permit provisions for the HWMU, the RCRA §3008 (h) corrective action Order and corrective action at the Facility. Additionally, later sections provide information on EPA's decision to issue the Draft Permit, the process for appealing a final permit decision by EPA, information concerning coordination with the Commonwealth of Puerto Rico, and information on how the Draft Permit is organized.

## II. PUBLIC REVIEW AND COMMENT:

### A. PUBLIC REVIEW

Pursuant to 40 C.F.R. §124.10, Public Notice has been given informing the public that EPA has prepared and issued a Draft RCRA permit for SCYI's Yabucoa facility. The Public Notice invites comments from interested citizens and sets forth the time and place of a public hearing to be held regarding the Draft Permit.

Copies of the complete SCYI Draft Permit, this Fact Sheet and the Public Notice are available for inspection any time between 8:30 A.M. to 4:00 P.M. Monday through Friday, except holidays, at the following locations:

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2  
Division of Environmental Planning & Protection  
RCRA Programs Branch  
290 Broadway, 22<sup>nd</sup> Floor  
New York, N.Y. 10007

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Caribbean Environmental Protection Division  
Centro Europa Building, Suite 417  
1492 Ponce de Leon Avenue  
Santurce, Puerto Rico 00907-4127

Telephone (787) 977-5849, and

PUERTO RICO ENVIRONMENTAL QUALITY BOARD (PR EQB)  
Ponce De Leon Avenue  
National Plaza Building, 12<sup>th</sup> Floor  
Hato Rey, Puerto Rico 00917

The complete Administrative Record underlying this permit action is also available for public inspection. The Administrative Record consists of this Fact Sheet, the Public Notice, the Draft Permit, the Permit Application and other documents contained in the supporting file for the Draft Permit.

The Administrative Record may be inspected at the following three locations::

- 1) U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2  
Division of Environmental Planning & Protection  
RCRA Programs Branch  
290 Broadway, 22<sup>nd</sup> Floor  
New York, N.Y. 10007

any time between 9:00 A.M. to 5:00 P.M. Monday through Friday, except holidays. Pursuant to requirements given at 40 CFR §124.8(b)(7), to obtain additional information on the Draft Permit, and/or to make an appointment to inspect the Administrative Record, please telephone Mr. Sameh Abdellatif, at (212) 637-4103, or submit a written request to Mr. Abdellatif, at the above address; and.

- 2) CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION (CEPD)  
Centro Europa Building, Suite 417  
1492 Ponce de Leon Avenue  
Santurce, Puerto Rico 00907-4127

To make an appointment to inspect and review the Administrative Record at that location, please telephone Mr. Daniel Rodriguez at (787) 977-5849; and

- 3) PUERTO RICO ENVIRONMENTAL QUALITY BOARD (PR EQB)  
Ponce De Leon Avenue  
National Plaza Bldg., 12<sup>th</sup> Floor  
Hato Rey, Puerto Rico 00917

To make an appointment to inspect and review the Administrative Record at that location, please telephone Mr. Efraín Camis at (787) 767-8181 ext.2834. The portions of the Administrative Record not physically available at CEPD or PREQB are nevertheless available for inspection pursuant to the following procedure. Annexed to this Fact Sheet is an index of all the documents comprising the Administrative Record. If an interested party in Puerto Rico wishes to inspect a document not included in the copy of the Administrative Record located at CEPD or PREQB, then such party may request a copy of the desired document by calling Mr. Sameh Abdellatif at

the telephone number listed above, and the requested document shall be mailed or otherwise transmitted to the requestor.

#### **B. PUBLIC COMMENT**

Pursuant to 40 CFR §124.10(b), written comments regarding the Draft Permit must be postmarked to the address listed below not later than forty five (45) days from the date of the Public Notice. Any available supporting materials should be attached to the written comments. The submission should be sent to:

MR. ADOLPH S. EVERETT, P.E.  
ACTING CHIEF, RCRA PROGRAMS BRANCH (2DEPP-RPB)  
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2  
290 BROADWAY, 22nd FLOOR  
NEW YORK, NEW YORK, 10007.

The Public hearing will be given on October 21, 2003 at 7:00 p.m. at Reynaldo Alvarez Costa Public Library, Catalina Morales Street (by the Fire Station) in Yabucoa, Puerto Rico. The public comment period will close on November 3, 2003, unless extended by the Director.

After the close of the public comment period (which includes the public hearing) the Director, pursuant to 40 CFR §124.15, shall issue a final permit decision. In reaching a final decision, the Director will consider all written comments received by EPA concerning the Draft Permit during the public comment period, including comments provided at any Public Hearing, and any supporting material. The Director's final permit decision will be in writing and will be sent, together with responses to comments received by EPA during the public comment period, to all persons who submitted comments or requested that they be notified of the decision, provided, of course, that such persons have given EPA a mailing address. If the Director's final permit decision is to issue the Permit, the decision will also specify what changes have been made in the final Permit from the Draft Permit, and other relevant information.

#### **III. FACILITY DESCRIPTION:**

The Permittee owns and operates a crude oil refinery at its SCYI Yabucoa Facility, which is approximately two miles east of the town of Yabucoa, Puerto Rico. The Facility occupies an area of approximately 252 acres, which have been subdivided into three working areas: the refinery area, the tank farm area, and the dock area. The refinery area, situated farthest west on the most inland portion of the site, includes SCYI's oil processing operations, product storage facilities, administrative and maintenance operations, a wastewater treatment plant, and the hazardous waste storage area (HWSA). The tank farm area is located at the center of the site and contains approximately 43 crude and product tanks ranging in size from 500 to 375,000 barrels. A tanker truck loading rack and a second wastewater treatment plant are also located in this area. The dock area is located farthest east, directly adjacent to the Caribbean Sea, and surrounding a small inlet area. The dock facility is used for loading and unloading of crude oil and products from oil tankers and smaller vessels and barges. No storage facilities, process units, or other operations are conducted in this area.



Land use north and west of the facility and east of the tank farm area is predominantly agricultural. The residential community of Camino Nuevo and Juan Martin wards are located south of the refinery and tank farm areas. As discussed above, the Caribbean Sea is located directly east of the Facility. The Santiago and Lajas Creeks are also located in close proximity to the site.

Refinery operations at the Facility began in May 1971 under PRSOC ownership. The Facility was transferred to SCYI in late 2001, and refinery operations continue to date. Refinery processing capacity has historically been reported at 85,000 barrels (1 barrel = 42 gallons) of crude oil per day. Major products have included kerosene, light distillates, reformat, naphtha, jet fuel, diesel fuel, No. 2 fuel oil, desulfurized gas oil, lube oil base stocks, residual fuels, aromatic extracts, slack wax, and sulfur. SCYI will also produce olefins.

#### IV. RCRA PERMITTING HISTORY OF THE FACILITY:

November 1980 PRSOC applied for and received a hazardous waste identification number from the United States Environmental Protection Agency.

November 1980 PRSOC submitted to EPA a Part A Permit Application which allowed it to qualify for interim status and to operate the hazardous waste storage area (HWSA) pending issuance of a permit.

July 14, 1995 PRSOC submitted an amended Part A Permit Application covering the HWSA.

July 26, 1995 PRSOC submitted a draft Part B Permit Application for continued operation of the HWSA.

November 14, 1997 EPA issued a Notice of Deficiency ("NOD") to PRSOC's draft Part B Permit Application dated July 1995.

April 20, 1998 PRSOC submitted a revised Part B Permit Application to EPA in response to the November 1997 NOD.

February 18, 1999 EPA issued a second NOD to PRSOC regarding the revised Part B Permit Application dated April 20, 1998.

April 21, 1999 PRSOC submitted a response to EPA's February 1999 NOD, along with revised sections of the Part B Permit Application.

January 6, 2000 EPA issued a third NOD to PRSOC on the revised Part B Permit Application dated April 21, 1999.

March 10, 2000 PRSOC submitted additional revisions to the draft Part B Permit Application in response to EPA's third NOD dated January 6, 2000.

May 24, 2000 Representatives from EPA and PRSOC met to discuss final comments on the Part B Permit Application for operation of the HWSA. EPA also requested that PRSOC complete a

table listing the containers in the HWSA that are subject to RCRA Subpart CC air emissions requirements.

July 15, 2001 PRSOC submitted its final Part B Permit Application for operation of the HWSA.

December 20, 2001 SCYI submitted a revised Part A Permit Application seeking approval for modifications to and expansion of the existing HWSA.

December 31, 2001 Ownership of the Facility is officially transferred from PRSOC to SCYI.

February 1, 2002 SCYI submitted a revised Part A Permit Application to reconcile some inconsistencies in the prior Part A submittal.

May 8, 2002 Using the final PRSOC application as a guide, SCYI submitted its final Part B Permit Application to EPA, incorporating plans for ongoing SCYI operations and documenting appropriate Facility representatives.

May 11, 2002 SCYI submitted revisions to the final Permit Application, along with an electronic copy of the application package.

May 29, 2002 SCYI submitted a revised page 4 of the Part A Permit Application to correct information about the hazardous waste unit.

September 6, 2002 SCYI submitted additional information on the containers subject to RCRA Subpart CC air emissions requirements; the table with this information is incorporated into the Part B Permit Application and the draft Permit by reference.

September 11, 2002 EPA determined that the final Part B Permit Application for the HWSA was technically complete. The May 8, 2002 final Part B Permit Application, as modified by the May 11, 2002 and May 29, 2002 revisions and the Subpart CC air emissions table dated September 6, 2002, is the application in response to which EPA has issued the Draft Permit and is referred to below as the "Permit Application."

#### V. HAZARDOUS WASTE MANAGEMENT UNIT TO BE PERMITTED:

SCYI currently operates one RCRA HWMU at the Facility which is proposed to be regulated under the subject Permit— the existing HWSA and all expansions planned and/or completed thereto, as approved by EPA. SCYI currently operates the HWSA under the interim status requirements of RCRA, 40 CFR Part 265. The only other regulated units at the Facility — the equalization basin and the new oily sludge basin — have been clean closed under interim status and are not subject to this permitting action. Wastewater treatment units at the SCYI Facility are excluded from RCRA regulation under 40 CFR §264.1(g)(6).

The HWSA is located at the northeastern corner of the refinery area. The unit currently includes two components: an enclosed storage building and a lined outdoor storage area immediately to the rear of the building. SCYI proposes to upgrade and expand the outdoor storage area to include specific areas for management of solid or liquid hazardous wastes. The enclosed storage

building is 60 feet long and 30 feet wide and is used for storage of non-liquid hazardous waste in containers. As proposed, the outdoor area will be upgraded, expanded, and divided into two sections. The northern section, with dimensions of 60 feet by 62 feet, will be used only for the storage of hazardous waste that does not contain free liquids. The southern section, with dimensions of 60 feet by 21 feet, will be used for the storage of liquid and non-liquid hazardous waste. U.S. Department of Transportation shipping containers are required for hazardous waste storage, including standard 55-gallon drums, roll-off containers, overpack containers, fiber bags, and other containers.

The HWSA accepts a wide variety of both hazardous and nonhazardous petroleum wastes generated at the SCYI facility. Hazardous wastes managed in the container storage area include primary oil/water/solids separation sludge (F037); secondary oil/water/solids separation sludge (F038); dissolved air flotation unit float (K048); slop oil emulsion solids (K049); heat exchanger bundle solids (K050); API separator sludge (K051); crude oil tank sediment (K169); spent hydrotreating catalyst (K171); spent hydrorefining catalyst (K172); ignitable waste (D001); benzene characteristic wastes (D018); off-specification methanol waste (U154); and other hazardous wastes, such as laboratory waste, spill residues, excess or off-specification raw materials or products, which are periodically generated at the Facility in limited quantities and are stored in containers for periods less than 90 days. Nonhazardous wastes generated at the Facility include spent catalyst from a number of process units, lime sludge, and biological treatment plan sludge. All wastes are transported off-site from the HWSA for proper treatment and/or disposal pursuant to RCRA requirements. SCYI does not provide on-site treatment or disposal of hazardous wastes.

#### VI. PERMIT PROVISIONS FOR THE HAZARDOUS WASTE MANAGEMENT UNIT:

The Permit as drafted will allow SCYI to store a maximum of 144,870 gallons of waste in the HWSA. The maximum number of containers allowed in the HWSA will depend on the types of containers used for storage, as outlined in greater detail in Permit Condition IV.A. The Permit authorizes such accumulation and storage of hazardous wastes, pending shipment of the containerized wastes off-site for disposal and/or treatment at commercial RCRA hazardous waste treatment or disposal facilities. The Permittee may also accumulate additional hazardous waste in other areas of the Facility for 90 days or less, subject to 40 CFR 262 requirements for short term accumulation. Also, SCYI may accumulate hazardous waste that is not listed in Permit Condition IV.B.1 in the HWSA for 90 days or less, subject to 40 CFR Part 262 requirements, provided the 144,870-gallon limit is not exceeded. Since the Permit as drafted will allow SCYI to store hazardous wastes in containers on site for longer periods of time, the Facility will be classified as a storage facility, and the HWSA will be subject to the requirements of 40 CFR Part 264.

Nothing in this Permit shall relieve the Permittee of its obligation to comply with applicable provisions of federal or commonwealth law.

#### VII. RCRA § 3008 (h) CORRECTIVE ACTION ORDER AND CORRECTIVE ACTION AT

## FACILITY:

In June 1994, EPA and the owner/operator at that time, PRSOC, entered into a RCRA § 3008 (h) Corrective Action Order on Consent (the "Order"), which required PRSOC to investigate 17 Solid Waste Management Units (SWMUs) across the site. Under the Order, PRSOC implemented a RCRA Facility Investigation (RFI) at the 17 SWMUs. Additional supplemental investigation and other corrective action activities are still required. When Module III of the Permit takes full effect, the Order will be terminated.

No groundwater monitoring is required for operation and permitting of the HWSA. However, pursuant to §3004(u) of RCRA, 42 U.S.C. §6924(u), the Permit addresses corrective action for all releases of hazardous waste and/or hazardous constituents from any SWMU at the Facility, regardless of the time waste was placed in such unit. A RCRA Facility Assessment (RFA) for the Facility was completed in 1989, and 46 SWMUs and 4 AOCs were identified. Five additional SWMUs were identified at the Facility subsequent to the RFA and prior to the RFI. Of the 51 SWMUs, a total of 34 were designated for no further action. Similarly, the 4 AOCs were designated for no further action. "No further action" means that the units do not pose a significant risk to the environment or human health under current land use, and require no cleanup. The public may comment on these "no further action" determinations now.

Additional investigation and/or corrective action were deemed appropriate for the remaining 17 SWMUs. Under the Order, mentioned above, PRSOC implemented an RFI at the 17 SWMUs. Based on the June 1997 RFI Draft Report and the October 1997 Process Sewer Report and subsequent submissions pursuant to the Process Sewer Report, a "no further action" determination has been made for SWMUs 32 (Process Sewer) and 44A (Ballast Basin Leachate Collection Tank) (See Module III A.4e.). Supplemental RFI efforts and interim corrective measures (including free product recovery) are ongoing at present for the remaining fifteen (15) SWMUs.

The Supplemental RFI includes free product recovery because during the performance of the RFI free product hydrocarbons (FPH) were discovered in soils and in groundwater underneath the facility, and measurable free product was observed in wells at several SWMUs. The present method employed by the Permittee to recover the FPH is manual recovery (ie., "bailing"). Under Module III of the Permit, as an interim corrective measure, the Permittee is required to continue monitoring the FPH and to operate the existing recovery program, "bailing," until one of the following, whichever comes first: (1) EPA makes a determination pursuant to Section B.6. of Module III of the Permit, that a more aggressive interim corrective measure is required and such interim corrective measure is implemented; (2) final remedies are selected and implemented according to the procedures outlined in Permit Condition F. of Module III; or (3) until EPA determines that all recoverable FPH has been removed from the subsurface and EPA formally indicates its concurrence with discontinuance of recovery operations.

A complete discussion of the SWMUs identified at the Facility, and their associated corrective action requirements, is provided in Module III of the Permit. Since no other AOCs have been identified at the Facility, the corrective action activities in Module III of the Permit do not include any corrective action for any AOCs.



Upon selection of any corrective action measure after the issuance of this Permit for any SWMUs, including new SWMUs or AOCs at the Facility that are identified subsequent to the issuance of this Permit, EPA will initiate a modification to this Permit pursuant to 40 C.F.R. §270.41. EPA also reserves the right to address this situation through the issuance of a separate order (See Module I.A. of this Permit).

Corrective action determinations for all SWMUs and AOCs (including no further action determinations) cannot be finally approved by EPA until they have been subject to public notice and comment. This public comment period is the opportunity for the public to comment on these determinations.

## VIII. DECISION TO ISSUE A DRAFT PERMIT:

### A. GENERAL

In reaching a decision to issue a Draft Permit, EPA has carefully reviewed the material contained in SCYT's Permit Application, including revisions thereto, and has studied other reports and data concerning the Facility. Based on the analysis and review of all relevant material conducted by EPA, the Director decided to issue the Draft Permit to SCYT.

The issuance of this Draft Permit is based on the assumption that the information provided in SCYT's Permit Application, and all succeeding revisions, is accurate. The Draft Permit is intended to fulfill RCRA statutory requirements contained in 42 U.S.C. §6925 and impose conditions on the Permittee that will be fully protective of human health and the environment.

The Draft Permit conditions are based on the requirements of 40 C.F.R. Part 124 (Procedures for Decision Making), 40 C.F.R. Part 270 (EPA Administered Permit Programs: The Hazardous Waste Permit Program), and 40 C.F.R. Part 264 (Standards for Owners and Operators of Treatment, Storage, and Disposal Facilities).

Subject to public notice and comment pursuant to the requirements of 40 CFR §124.10, and any comments during the public hearing held pursuant to 40 C.F.R. §§124.11 and 124.12, EPA intends to issue the Draft Permit to the Permittee as a final permit authorizing and regulating the storage of hazardous wastes at the Facility, in accordance with the Act; and (2) requiring the Permittee to conduct a corrective action program as outlined in Module III of the Permit.

### B. PERMIT TERM AND MODIFICATIONS

The Draft Permit is proposed to have a ten (10) year term (40 C.F.R. §270.50). When issued in final form, the permit thus would remain in effect for a 10 year period, unless revoked and reissued, modified, or terminated in accordance with 40 C.F.R. §§270.41, 270.42, or 270.43. If necessary, the final Permit may also remain in effect beyond its 10 year expiration date, in accordance with 40 C.F.R. §270.51(a).

## IX. APPEAL PROCESS FOLLOWING FINAL PERMIT DECISION:

After the Director has made a final permit decision, anyone wishing to appeal the Director's

decision should refer to the procedures set forth in 40 CFR §124.19 (and the new EAB mailing address for hand deliveries set forth at 68 Fed. Register 2203 (January 16, 2003)). That section states that within thirty (30) days after the date of issuance of the final permit decision, any person who filed comments on the Draft RCRA Permit may petition the Environmental Appeals Board ("EAB") to review the condition(s) of the permit decision upon which that person earlier commented. Any person who failed to file comments on the Draft RCRA Permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision. Furthermore, that section states that a person seeking appeal must exhaust administrative appeal procedures prior to seeking judicial review of the final agency action. Final agency action occurs when a final permit decision is issued by EPA and agency review procedures are exhausted.

The thirty (30) day period to request review of this final permit shall begin with the date of the service of the accompanying Notice of Issuance of the Final Permit Decision. (Note, for those parties receiving the Notice by mail, three (3) additional days will be added to prescribed thirty (30) day period, as provided in 40 CFR § 124.20(d).)

Please note that under 40 C.F.R. §124.19(a) any petition for review must be filed with the EAB and must include a statement of the reasons supporting the review, as well as other requirements mentioned in 40 C.F.R. §124.19(a). Any such petition must be received by the EAB on a timely basis.

#### X. COORDINATION WITH THE COMMONWEALTH OF PUERTO RICO

EPA and the EQB will cooperate with respect to all aspects of the SCYI RCRA hazardous waste permit. The Commonwealth of Puerto Rico is not presently authorized for the RCRA hazardous waste permitting or corrective action programs. However, in implementing the requirements of this permit, the Permittee must comply with all applicable Commonwealth of Puerto Rico statutes and regulations.

#### XI. PERMIT ORGANIZATION

This Draft Permit consists of the following Permit Modules and Attachments:

Module I	Standard Conditions
Module II	General Facility Conditions
Module III	Corrective Action
Module IV	Hazardous Waste Storage Area
Module V	Organic Air Emissions Standards for Containers
Module VI	Waste Minimization
Module VII	Closure
Attachment II-1	Waste Analysis Plan
Attachment II-2	Security & Procedures to Prevent Hazards
Attachment II-3	Inspection Schedule and Frequency & Summary Table
Attachment II-4	Example Inspection Log Forms
Attachment II-5	Emergency Spill Equipment List & Spill Containment Equipment List
Attachment II-6	Training Outline

Attachment II-7	Contingency Plan and Associated Attachments
Attachment III-1	The June 1997 RFI Draft Report and Subsequent Revisions in Response to EPA's Comments
Attachment III-2	RFI Summary Tables
Attachment III-3	The December 2000 Supplemental RFI Work Plan
Attachment III-4	The August 16, 2001, EPA's Letter Requiring More Aggressive Free Product Hydrocarbon Recovery
Attachment III-5	EPA Letter and Meeting Summary Regarding Environmental Indicator Requirements
Attachment III-6	Scope of Work for RCRA Facility Investigation
Attachment III-7	Scope of Work for A Corrective Measures Study
Attachment IV-1	Process Description
Attachment IV-2	Hazardous Waste Storage Area Containment Calculation
Attachment IV-3	Engineering Design Drawing For The Concrete Slab
Attachment VI-1	Waste Minimization Opportunity Assessment Manual
Attachment VII-1	Closure Plan and Financial Requirements